

EXHIBIT 1

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Janina M. Hoskins, Trustee in Bankruptcy

UNITED STATES BANKRUPTCY COURT
NORTHER DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re

CARL ALEXANDER WESCOTT and
MONETTE ROSEMARIE STEPHENS,

Debtors.

JANINA M. HOSKINS, Trustee in
Bankruptcy of the Estate of Carl
Alexander Wescott and Monette
Rosemarie Stephens,

Plaintiff,

v.

CARL ALEXANDER WESCOTT and
MONETTE ROSEMARIE STEPHENS,

Defendants.

Case No.: 12-30143 DM
(Chapter 7)

AP No. 12-3148

**REQUEST FOR ADMISSIONS TO
DEFENDANT MONETTE ROSEMARIE
STEPHENS**

PROPOUNDING PARTY: PLAINTIFF, JANINA HOSKINS, TRUSTEE IN BANKRUPTCY

RESPONDING PARTY: DEFENDANT, MONETTE ROSEMARIE STEPHENS

SET NUMBER: One (1)

Janina M. Hoskins, the Plaintiff herein, hereby propounds the following request for
admissions to Defendant Monette Rosemarie Stephens pursuant to Rule 36 of the Federal Rules
of Civil Procedure made applicable herein by Rule 7036 of the Federal Rules of Bankruptcy

1 Procedure.

2 DEFINITION OF TERMS

3 As used herein, the following terms have the meaning and significance set forth below,
4 unless otherwise specifically indicated:

5 1. You, Your: The term "You" and "Your" means the responding party, her
6 employees, agents, accountants, representatives, any corporation or partnership under her
7 direction, or any other person or entity acting on her behalf.

8 REQUEST FOR ADMISSIONS

9 REQUEST FOR ADMISSION NO. 1:

10 You had your wholly-owned subsidiary Atlas Consulting Group, Inc. pay storage unit
11 fees for Unit 3010 at City Storage, 500 Indiana Street, San Francisco, California.

12 REQUEST FOR ADMISSION NO. 2:

13 Your personal bank statements were stored at storage Unit 3010 at City Storage, 500
14 Indiana Street, San Francisco, California.

15 REQUEST FOR ADMISSION NO. 3:

16 You wired funds outside of the United States, within the last four (4) years.

17 REQUEST FOR ADMISSION NO. 4:

18 You owned property in Ecuador.

19 REQUEST FOR ADMISSION NO. 5:

20 You owned property in Uruguay.

21 REQUEST FOR ADMISSION NO. 6:

22 You have not been employed for the past two years.

23 REQUEST FOR ADMISSION NO. 7:

24 Your husband has not been employed for the past two years.

25 REQUEST FOR ADMISSION NO. 8:

26 Your husband gives you cash to pay your personal bills since the filing of the bankruptcy
27 petition.

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1 REQUEST FOR ADMISSION NO. 9:

2 Your husband was in San Francisco the week of March 11, 2013.

3 REQUEST FOR ADMISSION NO. 10:

4 You communicated with your husband the week of March 11, 2013.

5 REQUEST FOR ADMISSION NO. 11:

6 You received a beneficial interest of a promissory note from Rainforest Capital LLC in
7 the amount of \$564,877 effective May 1, 2010.

8 REQUEST FOR ADMISSION NO. 12:

9 You modified the Purchase Agreement with Valle Aventura, LLC on November 21,
10 2007.

11 REQUEST FOR ADMISSION NO. 13:

12 Your investment in the CAP V Qualified Investors Fund, LLC is held as Your separate
13 property.

14 REQUEST FOR ADMISSION NO. 14:

15 Your investment in the CAP VI Qualified Investors Fund, LLC is held as Your separate
16 property.

17 REQUEST FOR ADMISSION NO. 15:

18 Your or your husband transferred all monies out of the Pook Snook Dook LP bank
19 account.

20 REQUEST FOR ADMISSION NO. 16:

21 You transferred the Pook Snook Dook LP interest to Ivy League Charter LLC.

22 REQUEST FOR ADMISSION NO. 17:

23 In 2009, You and your husband owed federal income taxes for 2006.

24 REQUEST FOR ADMISSION NO. 18:

25 In 2007, you and your husband valued your home at 853 Ashbury Street, San Francisco,
26 CA at \$1,750,000.00.

27 REQUEST FOR ADMISSION NO. 19:

28 You are the sole owner of Surprise Development, Inc.

1 REQUEST FOR ADMISSION NO. 20:

2 You are a 50% owner of 1083 Mississippi Street, LLC.

3 REQUEST FOR ADMISSION NO. 21:

4 You and your husband sold property located in Panama to Valle Aventura, LLC.

5 REQUEST FOR ADMISSION NO. 22:

6 You sold all of the shares you held in Valle Aventura, LLC on May 1, 2009.

7 REQUEST FOR ADMISSION NO. 23:

8 As the General Partner of the Pook Snook Dook Limited Partnership, you agreed to
9 discount the Rainforest Capital Note of \$584,877.00 to \$356,247.70.

10 REQUEST FOR ADMISSION NO. 24:

11 As of August 8, 2007, you were a 50% member in Unexpected Development LLC.

12 REQUEST FOR ADMISSION NO. 25:

13 As of August 8, 2007, your husband was a 50% member in Unexpected Development
14 LLC.

15 REQUEST FOR ADMISSION NO. 26:

16 You were an investor in Vilcabamba Homes LLC.

17 REQUEST FOR ADMISSION NO. 27:

18 You granted special power of attorney to Veronica Butler Terra, so that she could execute
19 a mortgage deed on a plot of land located in the rural area of the Tenth Land Register Section of
20 the Department of Rocha, Uruguay.

21 REQUEST FOR ADMISSION NO. 28:

22 You granted special power of attorney to Lucia Carluccio of Uruguay to act in Your name
23 and represent You in all proceedings before the Municipality of Rocha, the Bank of Social
24 Security, the State Telecommunications Company, the Land Register Office and the Ministry of
25 Housing for property known as Laguna Tranquil, Property No. 62769, Rocha, Uruguay.

26 Dated: April 2, 2013

MacConaghy & Barnier, PLC

27 

28 Jean Barnier

Attorneys for Plaintiff Janina M. Hoskins,

Trustee of said property